

2001-014-213

THE BAUT STUDIOS, INC.

ECCLESIASTICAL CRAFTSMEN

1095 MAIN STREET, SWOYERSVILLE, PA. 18704 P.O. BOX 1457, KINGSTON, PA. 18704

June 14, 2001

General Services Administration FAR Secretariat (MVP) 1800 F St NW Room 4035 Washington DC 20405 Attn: Laurie Duarte

Re: FAR Case 2001-014

I am writing to express my support for the Federal Acquisition Regulations (FAR) Council's proposal to repeal the Clinton administration's rules on federal contractor responsibility. The rule would require each prospective contractor, under penalty of criminal liability for false swearing, to certify the contractor's compliance with all federal, state, and foreign labor, employment, tax, environmental, antitrust, and "consumer protection" laws and regulations over the previous three years.

The rule would also force contracting officers to make determinations concerning the contractor's satisfactory compliance with such laws and regulations based on vague criteria, leading to inconsistent application.

Punitive and unnecessary, this rule would have a devastating effect on federal contracting. Contrary to the spirit of earlier procurement streamlining reform, the rule would result in uncertainties, increased legal challenges, wasteful delays, and unwarranted new regulatory burdens. The rule lacks a rational basis because it has effectively removed any nexus between the government's determination of responsibility and contractor's ability to perform the contract.

I urge the FAR Council to repeal the contractor responsibility rules.

Sincerely,

Conrad Dismas Baut

Winad Bant

PHONE (570) 288-1431 1-800-326-9421 FAX (570) 288-0380 6/2/101